

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

UNITED STATES OF AMERICA

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CRIMINAL NO. 2:16-CR-00378-DCN

v.

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MICHAEL SLAGER

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**GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION
TO EXCLUDE TESTIMONY OF BILL WILLIAMS**

On February 10, 2017, the defendant filed a motion to exclude the “proposed expert testimony of William A. (Bill) Williams.” ECF No. 66. The motion correctly states that the government has not decided whether to call Mr. Williams to testify and if so, on what subjects, but has reserved the right to do so in a manner coextensive with his testimony in state court. Accordingly, the defendant suggests that his specific objections to his testimony be reserved until the government identifies the specific work product it seeks to introduce, and the government does not object. The government will provide the defense with his updated work product in advance of the anticipated *Daubert* hearings. The government notes, however, that not all of Mr. Williams’ testimony would require his qualification as an expert. Portions of his testimony and work product should be considered to be summary exhibits or demonstrative evidence, or matters not requiring the level of technical expertise necessary to qualify as expert testimony.

Respectfully submitted,

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